



SDMS DocID

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THE RESEARCH FOUNDATION

*The State University of New York*

*Office of the General Counsel and Secretary*

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Albany, New York

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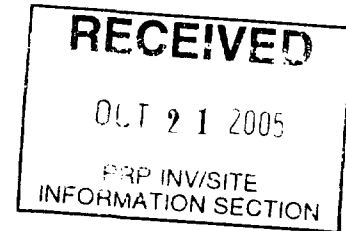
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October 4, 2005

**Via Federal Express Tracking Number: 7912 2590 6006**

Mr. Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region 3  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029



Re: C:550: Information Request  
Safety Light Corporation

Dear Mr. Steinmetz:

In response to your recent information request regarding the above captioned corporation's relationship to the Research Foundation of State University of New York (the "Foundation") and SUNY College of Environmental Science and Forestry ("SUNY ESF"), the following information is being submitted:

1. On or about February 28, 1962, the Foundation, on behalf of the State University of New York College of Forestry, now SUNY ESF, purchased one ampoule (1mCi) of Ra-D (Pb-210) from U.S. Radium. There is no known record or information regarding any other business relationship between the Foundation, SUNY ESF and Safety Light or any of its predecessors and/or affiliates including U.S. Radium.
2. Pursuant to a search of the archives at SUNY ESF, there is no information or existing record of any transport and/or brokering of hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite to the Site.
3. a.-c. There are no known records or information regarding any transport and/or brokering of hazardous substances, radioactive waste or other wastes.
4. Pursuant to a search of the archives, there are no known records or information with respect to SUNY ESF generating radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site.

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U.S. Environmental Protection Agency, Region 3  
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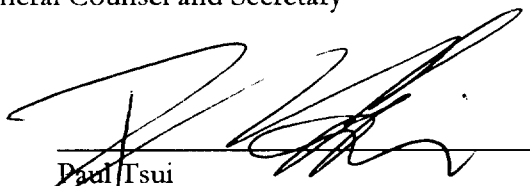
5.
  - a. There are no known records or information.
  - b. There are no known personnel or information.
  - c. There are no known contracts or records.
  - d. There are no known instances of such activity and no known records or documents regarding such instances.
  - e. None known.
  - f. None known.
  - g. None known.
  - h. None known.
  - i. None known.
  - j. Paul Tsui, Associate Attorney, The Research Foundation of State University of New York, 35 State Street, P.O. Box 9, Albany, New York 12201-0009; telephone (518) 434-7045.
  - k. Dr. Mark S. Driscoll of the Office of Radiation Safety, SUNY College of Environmental Science and Forestry, Syracuse New York; telephone (315)470-6848.
6. John Myer, Dr. Driscoll's predecessor responsible for keeping such records, is deceased.
7. John Myer, Dr. Driscoll's predecessor responsible for keeping such records, is deceased.
8. John Myer, Dr. Driscoll's predecessor responsible for keeping such records, is deceased.
9. A search was conducted of the archives at SUNY ESF for the documents you have requested. Records pertaining to this 1962 transaction, if any existed, were destroyed.
  - a. A copy of the Foundation's record retention policy is attached hereto.

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- b. It is unknown how or when the records were destroyed if any records even existed.
- c. This request calls for speculation as to what would have been contained in the documents. The documents would, at most, reflect the date of the transaction and the nature of the transaction.
- d. John Myer, Dr. Driscoll's predecessor in the Office of Radiation Safety at SUNY ESF, would have had the primary responsibility of maintaining the records if there were a requirement to maintain such records at that time.

Please contact me if you require any additional information.

Sincerely,  
James R. Dennehey  
General Counsel and Secretary

by:   
Paul Tsui  
Associate Attorney

c: Ms. Connie S. Webb  
Dr. Mark S. Driscoll

## Record Retention Policy for Paper and/or Data Records

- Introduction
- Policy
- Definition of Record
- Separation of Records
- Business Process Areas and Record Retention Requirements
- Record Retention Management
- Access to Research Data

### RELATED POLICY

#### Introduction

This document provides The Research Foundation of SUNY (RF) policy for the retention of paper and/or data records. It identifies the basis for the policy, defines a record, discusses the need for separation of records, provides the retention requirements for paper and/or data records, and identifies the requirements for record management to ensure compliance with the policy. In addition, corporate guidance is provided for access to research data under the Freedom of Information Act.

#### Policy

The RF record retention policy is based upon federal government and New York State (NYS) government statute and regulation. Federal and NYS government sources were used to identify the minimum legal requirements for specific types of records, and to determine the minimum corporate requirements for RF paper and/or data records. In summary, the policy is primarily based on reference/citation from these sources:

- **Federal Government:** United States Code, Code of Federal Regulations, and Office of Management and Budget Circular A-110, *Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations*
- **New York State Government:** NYS State Archives and Records Act, NYS Statute of Limitations, NY Code of Rules and Regulations

#### Definition of Record

A record is defined as, but is not limited to the following:

- **Paper/text documents, computer data, electronic records, microfilm, computer tapes, maps, and video/audio recordings.**
- **Material in any medium retained for reference and/or citation purposes is not considered a record.**

#### Separation of Records

RF records *must* be retained separately from State University of New York (SUNY) records.

- **The RF and SUNY are distinct and separate organizations and their records *must* not be co-mingled. As a private, nonprofit corporation RF records are not subject to the NYS Freedom of Information Law (FOIL).**
- **If RF and SUNY records were co-mingled and the SUNY records became subject to a Freedom of Information request, the RF records could not be separated and would also be subject to release.**

#### Business Process Areas and Record Retention Requirements

**Business Process Areas**

The RF record retention policy identifies the minimum legal and corporate requirements for the paper and/or data records in these business areas:

- Human Resources and person-related records
- Finance Office and account expenditure records
- Sponsored Program Services and project administration records.

**Record Retention Requirements**

Detail tables for each business area identify the specific paper and/or data records and their requirements. In addition, the tables provide information on the office of record and justification (e.g., federal and state government reference/citation) for the current retention requirements. Note: It was determined that the required retention periods for data records should be consistent with the retention periods for paper records.

**Record Retention Management**

The following requirements identify the principles of good record management to ensure compliance with the RF retention policy for paper and/or data records. The requirements identify *what* records to retain, *where* to retain records, *how* to retain records and for how long, and *when* to dispose/destroy records.

**What Records to Retain**

The following list provides examples of the specific types of records identified in the business process detail tables.

- Human Resources and person-related records: attendance reports, fellowship files, garnishments, income fund reimbursable files, leave accrual/use records, personnel activity reporting forms, personnel/payroll files, retirement records
- Finance Office and account expenditure records: payroll and general journal entries [expenditure transfers], petty cash documents, vendor [accounts payable] payment files, property control system records.
- Sponsored Program Services and project administration records: account billing and correspondence files, grant agreements, contracts, subcontracts, leases, consultant agreements, patent records, technology transfer documents
- Each business process area is also responsible for permanent corporate records that include: monthly account summaries, issue/cancel registers, journals, vendor check registers, financial statements, tax returns, vendor 1099s, W-2s and payroll 1099s, vendor [accounts payable] and payroll 1042s, year-end personnel/payroll benefit data, patent records.

**Where to Retain Records**

Records must be retained at the office of record (e.g., central office, operating location) identified in the business process detail tables. Determination of the office of record is based on the specific type of record. It is appropriate and an effective business practice for central office to retain certain types of records (e.g., financial statements) for all operating locations, and for the individual locations to retain others (e.g., petty cash bank statements).

**How Long to Retain Records**

Specific paper and/or data records must be retained in accordance with the minimum legal and corporate requirements identified in the business process detail tables. Operating locations may decide to retain certain records for longer periods of time, however this decision must be clearly identified and documented in the campus-specific policy. In addition, the RF must comply with any sponsor-specific record retention requirements. If a sponsor requires records be retained for a longer period than required by the RF policy, the sponsor's requirements take precedence and must be followed.

**When to Dispose/Destroy Records**

Paper and/or data records must only be disposed/destroyed when the RF minimum retention period has been met, any sponsor-specific required retention period has been met, final payment has been received, and there is no ongoing audit, claim, or litigation relating to the record.

**Access to Research Data**

OMB Circular A-110 was amended November 8, 1999 to provide public access to research data under certain circumstances, through the Freedom of Information Act (FOIA). Universities will get a FOIA request for research data - at some point in time.

- Corporate Guidance: The RF developed a corporate guidance document for implementation of the amended Circular. Campuses should use this guidance to understand the basic scope of the amendment, develop implementation and communication plans, and to inform principal investigators about the potential impact on their research data.
- The corporate guidance document is available at: <http://www2.rfsuny.org/comply/pending/A110guide123099.htm>.

**Effective Date: November 21, 2001**

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Updated 06/07/05 01:00:13 PM Eastern Time

## Record Retention for Project Administration Records

- Purpose
- Contact
- Detail Table

### RELATED POLICY

#### Purpose

This detail table identifies the minimum legal and corporate requirements for the retention of *person-related* paper and/or data records applicable to *sponsored project administration*. Campus can copy this table for administrative purposes only (e.g., add action item column) to assist with their implementation of the requirements.

#### Contact

Carol H. Berdar, Sponsored Program Services

#### Detail Table

Administrative		Justification			Required Retention Period
Record	Office of Record	Legally Required Period (Skupsky Typical Period) (1)	Legal Authority for Selected Retention Period	Business Practice	For Paper and/or Data (3)
Award Billing Files	Decentralized operating locations, and central office on behalf of centralized locations	NA (2)	OMB Circular A-110, Section .53(b) - grants  NYS Archives & Records Act, 8 NYCRR Part 188 - contracts	10 fiscal years	6 years after award closed date
Award Correspondence Files (Includes financial reports)	Decentralized operating locations, and central office on behalf of centralized locations	NA (2)	OMB Circular A-110, Section .53(b) - grants  NYS Archives & Records Act, 8 NYCRR Part 188 - contracts	10 fiscal years	6 years after award closed date
Grant Agreements,	Decentralized operating	NA (2)	OMB Circular	10 fiscal	6 years after



Prime Contract Files, Subcontracts, Lease Agreements, Consultant Agreements	locations, and central office on behalf of centralized locations		A-110, Section .53(b) - grants  NYS Archives & Records Act, 8 NYCRR Part 188 - contracts	years	award closed date
Patent Records, includes patents, applications, agreements	Decentralized operating locations, and central office on behalf of centralized locations	Patents: active + 6 years  Applications: Active  Agreements: active + 6 years	NY Statute of Limitations	Permanent	Letters Patent: Life of patent  Applications and Correspondence: 6 years after case file is closed  Agreements: 6 years after license closed date  Paper records are not supported by system data.
Technology Transfer Documents	Locations decentralized for technology transfer retain original license/option, confidentiality, materials exchange, and software agreements, memorandums of understanding, and new technology disclosure forms.  Central office retains <i>original</i> issued patents and all technology transfer documents for centralized locations.	Patents: active + 6 years  Applications: Active  Agreements: active + 6 years	26 USC 6501	10 fiscal years	Applications and Correspondence: 6 years after case file is closed  Agreements: 6 years after license closed date  Paper records are not supported by system data.
Cost Sharing by Grant Report  Legacy - RPADD301	NA	NA (2)	OMB Circular A-110, Section .53(b) - grants  NYS Archives & Records Act, 8 NYCRR Part	10 fiscal years	6 years after award closed date

			188 - contracts		
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(1) Based on the books Record Retention Procedures and Recordkeeping Requirements, authored by Donald S. Skupsky, J.D., President and General Counsel of Information Requirements Clearinghouse, Denver, Colorado. The typical legal retention period satisfies all requirements of federal law and the requirements of the laws of most states. It may not satisfy requirements of law in some states that are clearly exceptional.

(2) The 2 Skupsky legal reference books (see footnote 1) do not identify "typical" periods for project administration records - other than for patent and technology transfer records.

(3) Operating locations should retain for two calendar years copies of any records that the central office retains permanently for them.

Date	Change History
11/14/01	Replaces "Requirements for Project Administration" table in previously issued "Record Retention Guidelines."

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Updated 11/16/01 12:09:07 PM Eastern Time

## Record Retention for Account Expenditure Records

- Purpose
- Contact
- Detail Table

## RELATED POLICY

## Purpose

This detail table identifies the minimum legal and corporate requirements for the retention of *account expenditure* paper and/or data records applicable to the *Finance Office*. Campus can copy this table for administrative purposes only (e.g., add action item column) to assist with their implementation of the requirements.

## Contact

David Martin, Finance Office

## Detail Table

Administrative		Justification			Required Retention Period
Record	Office of Record	Legally Required Period (Skupsky Typical Period) (1)	Legal Authority for Selected Retention Period	Business Practice	For Paper and/or Data (3)
Monthly Account Summary (MAS) Reports  Legacy - RASD4091	Central office for all locations	Current year + 4	26 USC 6501	Account Reconciliation	Current fiscal year + 4
Income Fund Reimbursable (IFR) Registers  Legacy - PR101000	Central office for all locations	Current year + 4	26 USC 6501	Bank Reconciliation	Current calendar year + 4
Issue/Cancel Registers: Payroll & Vendor  Legacy - RVSD3182	Central office for all locations	Current year + 4	26 USC 6501	Bank Reconciliation	Current calendar year + 4
Journals (budget, general journals, cash receipts, indirect cost, account expenditure reports)  Legacy - RAGD41816	Central office for all locations	Current year + 4	26 USC 6501	Account Reconciliation	Current fiscal year + 4
Journal Entries: Payroll	Central office if	Current year	26 USC 6501	Account	Current

and <b>General</b> <b>Legacy</b> - RASD3751	input by central office, campus if input by campus	+ 4		Reconciliation	calendar year + 4
<b>Petty Cash Bank</b> <b>Statements, Deposit Slips,</b> <b>and Checks</b>	Operating locations	Current year + 4	26 USC 6501	Bank Reconciliation	Current fiscal year + 4
<b>Petty Cash Vouchers</b>	Operating locations	Current year + 4	26 USC 6501	Audit Requirement	Current fiscal year + 4
<b>Vendor Check Registers</b>  <b>Legacy</b> - RASD3121	Central office for all locations	Current year + 4	26 USC 6501	Bank Reconciliation	Current fiscal year + 4  Data: 10 days
<b>Vendor Payment files</b> (may include purchase orders, purchase requisitions, vendor invoices, receiving documents, bids, vendor contracts, documentation for payments exceeding \$100,000)	Operating locations	Current year + 4	26 USC 6501	Audit Requirement	Paper: Current fiscal year + 4  Data: Current fiscal year + 1
<b>Vendor 1099s</b>  <b>Legacy</b> - RAGD0254	Central office for all locations	Current year + 4	26 USC 6501	IRS Requirement	Current calendar year + 4
<b>Vendor 1099 Year End</b> <b>Reports</b>  <b>Legacy</b> - RVSC0255	Central office for all locations	Current year + 4	26 USC 6501	IRS Requirement	Current calendar year + 4
<b>Property Control System</b> <b>(PCS) Records</b>	Operating locations	3 years from final disposition  ----- - Active + 4 years	OMB Circular A- 110, Section .53 (b)(2)  ----- 26 USC 6501	Sponsor Requirements	3 years from final disposition
<b>Property Report Files</b>	Central office for all locations except 010, 020, 030, 050, 655	Active + 4 years	OMB Circular A- 110, Section .53 (b)(2)  ----- 26 USC 6501	Sponsor Requirements	6 years from submission
<b>Financial Statements and</b> <b>Report of Independent</b>	Central office for all locations	10 years	NY N-PCL 621; Legal	Audit Requirements	10 years

Accountants			Considerations		
Monthly Trial Balance and General Ledger (ACCPAC)	Central office for all locations	Current year + 4	26 USC 6501	General Ledger Reconciliation	Current fiscal year + 4
Tax Returns (IRS Form 990)	Central office for all locations	Current year + 4	26 USC 6501	IRS Requirements	Current fiscal year + 4
Royalty Payments	Central office for all locations	Current year + 4	26 USC 6501	Invention Contracts	Current fiscal year + 4
Stores Account Register Legacy - RAGD3101	Central office for all locations	Current year + 4	25 USC 6501	Account Reconciliations	Current fiscal year + 4
Indirect Cost Proposals and supporting workpapers	Central office	Current year + 4	OMB Circular A-110, Section .53 (g)(1)	Audit Requirement	3 years from date of submission
Records for the facilities portion of indirect cost proposals, including space records, property records, metering records, etc.	Operating locations	Current year + 4	OMB Circular A-110, Section .53 (g)(1)	Audit Requirement	3 years from date of submission
Proposals for fringe benefit rates, including supporting workpapers, etc.	Central office	Current year + 4	OMB Circular A-110, Section .53 (g)(1)	Audit Requirement	3 years from date of submission

(1) Based on the books Record Retention Procedures and Recordkeeping Requirements, authored by Donald S. Skupsky, J.D., President and General Counsel of Information Requirements Clearinghouse, Denver, Colorado. The typical legal retention period satisfies all requirements of federal law and the requirements of the laws of most states. It may not satisfy requirements of law in some states that are clearly exceptional.

(2) Operating locations should retain for two calendar years copies of any records that the central office retains permanently for them.

Date	Change History
11/4/01	Replaces "Requirements for Account Expenditure Records" table in

previously issued "Record Retention Guidelines."

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Updated 11/14/01 10:54:03 AM Eastern Time

## Record Retention for Person-Related Records

- Purpose
- Contact
- Detail Table

### RELATED POLICY

#### Purpose

This detail table identifies the minimum legal and corporate requirements for the retention of *person-related* paper and/or data records applicable to *Employee Services*. Campus can copy this table for administrative purposes only (e.g., add action item column) to assist with their implementation of the requirements.

#### Contact

Mary Ellen Frieberg, Employee Services

#### Detail Table

Administrative		Justification			Required Retention Period
Record	Office of Record	Legally Required Period (Skupsky Typical Period) (1)	Legal Authority for Selected Retention Period	Business Practice	For Paper and/or Data (3)
Attendance Reports/Exception Reports (time sheets)	Operating locations	3 years	5 CFR 1320.6, A-110 sec .53(b)	Supervisor and/or employee requests, sponsor and DOL audits  7 years	3 calendar years after project account is purged (4)
Fellowship Files	Operating locations	3 years	29 CFR 1627.3, A-110 sec .53(b)	Sponsor audits  10 years	3 calendar years after project account is purged (paper and data) (4)
Garnishments	Central office for all locations	Active	26 USC 6501	Tax reporting/ reasonable business process  3 years	Current calendar year + 4
Income Fund Reimbursable (IFR) Files (may include IFR appointment/ change/inactive status)	Operating locations	3 years	29 CFR 1627.3, A-110 sec .53(b)	Sponsor audits  7 years	3 calendar years after project account is purged (paper and data) (4)

forms) <b>Legacy</b> - RR101000					
Leave Accrual Use Records	Operating locations	Indefinite	29 USC 1113 + legal consideration	Supervisor requests to verify time worked/time off  7 years	3 calendar years after project account is purged (4)
PARS Forms/Rosters (certified)  <b>Legacy</b> - multiple	Operating locations	6 years	5 CFR 1320.6A-110 sec .53(b) and NYSARA, 8 NYCRR part 188	Sponsor audits  7 years	3 fiscal years after final report is submitted
PARS Forms/Rosters (uncertified)  <b>Legacy</b> - multiple	Central office	6 years	5 CFR 1320.6A-110 sec .53(b) and NYSARA, 8 NYCRR part 188	Backup for certified forms, which are sometimes lost  3 years	3 fiscal years after final report is submitted
Personnel/Payroll files: Must include appointment/change forms, W-4s, and provider-service deduction authorization forms.	Operating locations	3 years	29 CFR 1627.3	Document retirement service credit and pay rate, rehire information, survivor benefits, discrimination claims  Permanent	Permanent for retirement service credit and pay rate documentation.  6 calendar years after termination for all other items in file
Retirement Records	Central office	Indefinite	29 USC 1113 + Legal consideration	ERISA fiduciary requirement  Permanent	Permanent
RF Insurance Enrollment Form	Operating locations	6 years	29 USC 1113	HCFA data match, HIPAA documentation  Active + 7	Active + 6 calendar years
Optional Retirement Forms (including MEA calculations for years 2001 and earlier)	Central office if input by C.O. Otherwise Operation locations	6 years	29 USC 1113	IRS Audit	Active + 6 calendar years
W-2s and Payroll 1099	Central office	Current year + 4	26 USC 6501	Expected level of service	Current year + 4 calendar years



				Permanent	
W-2 and Payroll 1099 Year End Reports  Legacy - RPRD 30915	Central office	3 years	5 CFR 1320.6	7 years	3 calendar years
Vendor and Payroll 1042s	Central office	3 years	5 CFR 1320.6	Consistent with W- 2s and Payroll 1099s  Permanent	Current year + 4 calendar years
Vendor and Payroll 1042 Year End Reports  Legacy - RPRD 0282	Central office	Current year + 4	5 CFR 1320.6	7 years	3 calendar years
*Payroll Issue/Cancel Register	Central office	Current year + 4	26 USC 6501	7 years	Current calendar year + 4
*Payroll Journal Entries	Central office if input by C.O. Otherwise Operation locations	Current year + 4	26 USC 6501	7 years	Current calendar year + 4
Payroll Deduction Registers (bonds, credit union, parking, etc.)  Legacy - RPRC 0691	Central office	Current year + 4	26 USC 6501	7 years	Current calendar year + 4
Payroll Registers: Regular and Fellow  Legacy - RPRC 0231	Central office	Current year + 4	26 USC 6501	Permanent	Current calendar year + 4
CWS Payroll Register	Central office	Current year + 4	25 USC 6501	7 years	Through 2000 (program ended '96)
Personnel/payroll and benefit data	Central office	6 years	29 USC 1113, A-110 sec .53(b)	Pension administration, sponsor audits, legal activities including ERISA fiduciary HCFA data match, HIPAA documentation	Permanent for service and pay history (retirement)  Active + 6 calendar years for all other history

				Year end files permanent	
CWS <del>issue/cancel</del> register	Central office	Current year + 4	26 USC 65017	7 Years	Through 2000 (program ended '96)
CWS Payroll YTD	Central office	Current year + 4	26 USC 6501	7 years	Through 2000 (program ended '96)
Issue/Cancel Dist. FB Report  Legacy - RPRD 1021	Operating locations	6 years	29 USC 1113	7 years	Current calendar year + 4
Payroll Dist. FB Report  Legacy - RPRC 0961	Operating locations	Current Year + 4	26 USC 6501	7 years	Current calendar year + 4
Payroll 1099 Information  Legacy - PR 119000	Central office	Current Year + 4	26 USC 6501	7 years	Current calendar year + 4
Payroll W2 information  Legacy - PR 119000	Central office	Current Year + 4	26 USC 6501	7 years	Current calendar year + 4
IFR Check Summary  Legacy - PR 107000	Central office	Current year + 4	26 USC 6501	Sponsor rules  7 years	Current calendar year + 4
IFR Control Report  Legacy - PR 100000	Central office		A-110 sec .53(b)	Sponsor rules  7 years	Current calendar year + 4
IFR Payroll Dist. of Grant Charges  Legacy - RPRD 3061	Central office		A-110 sec .53(b)	Sponsor rules  7 years	Current calendar year + 4
Insurance policies	Central office	6 years	NY Statute of Limitations	Active + 6	Active + 6 calendar years
Other contracts	Central office	Active + 6 years	NY Statute of Limitations	Active + 6	Active + 6 calendar years
Collective bargaining agreements	Central office	Active + 6 years	NY Statute of Limitations	Active + 6	Active + 6 calendar years
Legal opinions	Central office	Active + 3 years	5 CFR 1320.6	Document decisions based on opinions	Permanent

				Permanent	
Actuarial records	Central office			Analyze trends, document decisions  10 years	Current year + 4 calendar years
Educational assistance files	Operating locations	6 years	29 USC 1113	6 years	6 calendar years
Employee manuals	Central office	Active + 10	Legal considerations	No policy	6 calendar years
Job descriptions	Operating locations (C.O. for position standards)	Active + 10	Legal considerations	No policy	6 calendar years
Accident reports	Operating locations	Current year + 5	29 CFR 1904.6	See Personnel file	Current calendar year + 5
Employee medical records	Operating locations	Active + 30	20 CFR 1910.20	Separate Personnel file	Active + 30 calendar years
Form EEO-1	Operating locations (C.O. has consolidated form)	3 years	5 CFR 1320.6	3 years	3 calendar years
Hazardous material records	Operating locations	30 years	29 CFR 1910.20	NA	40 calendar years
Employee exposure records	Operating locations	30 years	29 CFR 1910.20	See Personnel file	40 calendar years
PBGC premium payments	Central office	Current year + 4	26 USC 6501	10 years	Current calendar year + 4
OSHA Records: Log (form 200 and form 300) Incident Report (form 301) Summary (form 300A)	Operating locations	Current year + 5	29 CFR 1904.6	Current year + 5	Current calendar year + 5
Recruitment records	Operating locations	1 year	29 1627.3	1 year	1 calendar year
Training and development records	Operating locations	Active	29 CFR 1627.3	6 years	Active
Salary studies	Central office	Active	5 CFR 1320.6	Active	Active

Audit reports	Central office	3 years		3 years	3 calendar years
Tax returns	Central office	Current year + 4	26 CFR 301.650 (f)-1	6 years	Current calendar year + 4
Benefit Plan Form 5500	Central office			IRS/DOL audits Permanent	Current calendar year + 6
Affirmative action claims	Operating locations	Active	Legal considerations	Consistent with Personnel file	Active + 6 calendar years
Benefit Handbooks, Newsletters	Central office	Active + 10 years	Legal considerations	Benefit history Permanent	Active + 10 calendar years
Bids accepted	Central office	Active + 6	NYS Statute of Limitations	Active + 6	Active + 6 calendar years
Bids rejected	Central office	1 year		Document decision 3 years	1 calendar year

(1) Based on the books Record Retention Procedures and Recordkeeping Requirements, authored by Donald S. Skupsky, J.D., President and General Counsel of Information Requirements Clearinghouse, Denver, Colorado. The typical legal retention period satisfies all requirements of federal law and the requirements of the laws of most states. It may not satisfy requirements of law in some states that are clearly exceptional.

(2) If a specific business practice is not cited, business practice agrees with legal requirement. Business practice is applicable to paper, fiche/alternate storage, and data records.

(3) Operating locations should retain for two calendar years copies of any records that the central office retains permanently for them.

(4) Or if earlier, 7 calendar years after employee or fellow terminates.

Date	Change History
11/14/01	Replaces document PE-A-92 from the Personnel Operations Manual and "Requirements for Person-Related Records" table in previously issued "Record Retention Guidelines."
01/18/02	Revised to update information for OSHA Records.
03/04/02	Revised to add information for Optional Retirement Forms.

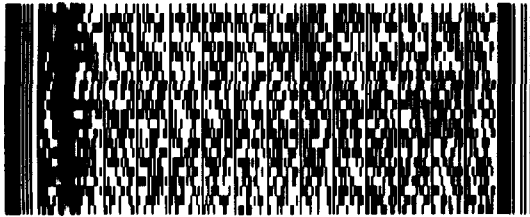
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ALBANY, NY 12207



CL889 790509/15

SHIP TO: (518)434-7045 **BILL SENDER**  
**Mr. Harry R. Steinmetz (3HS62)**  
**US EPA, Region 3**  
**1650 Arch Street**

**Philadelphia, PA 191032029**

Ship Date: 04OCT05  
Actual Wgt: 1 LB  
System#: 5867680/INET2200  
Account#: S \*\*\*\*\*

REF: Legal



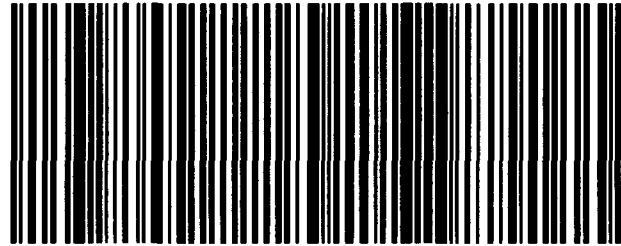
Delivery Address Bar Code

**PRIORITY OVERNIGHT****WED**Deliver By:  
05OCT05

TRK# 7912 2590 6006

FORM  
0201**PHL****A1**

19103 -PA-US

**Z9 PSQA**

Shipping Label: Your shipment is complete

1. Use the 'Print' feature from your browser to send this page to your laser or inkjet printer.
2. Fold the printed page along the horizontal line.
3. Place label in shipping pouch and affix it to your shipment so that the barcode portion of the label can be read and scanned.

**Warning:** Use only the printed original label for shipping. Using a photocopy of this label for shipping purposes is fraudulent and could result in additional billing charges, along with the cancellation of your FedEx account number.

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